

# EXHIBIT A



**Service of Process  
Transmittal**

01/18/2022

CT Log Number 540890212

**TO:** TAMELA KELLEY  
Steward Health Care System LLC  
1900 N. PEARL STREET SUITE 2400  
DALLAS, TX 75201

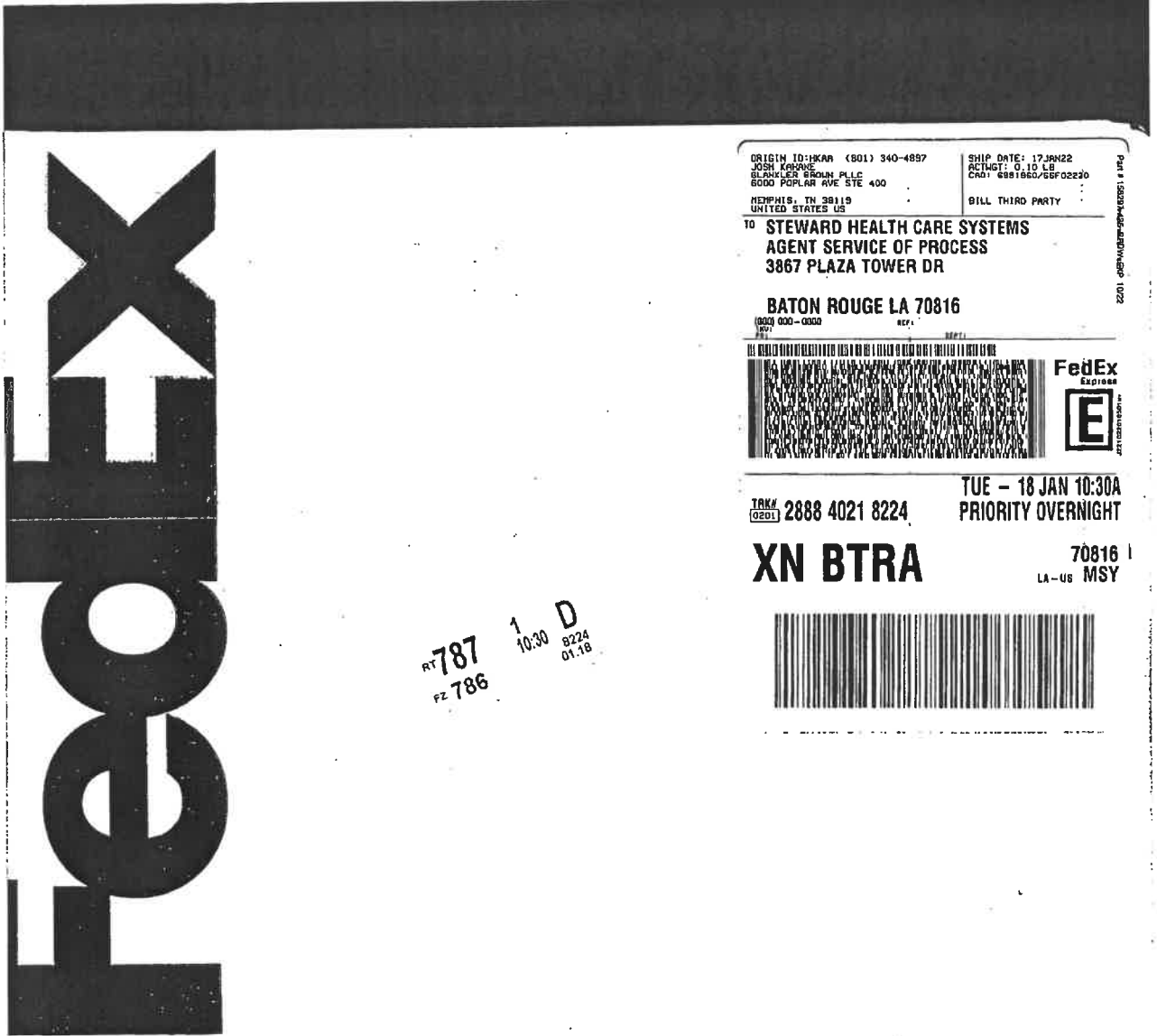
**RE: Process Served in Louisiana**

**FOR:** Steward Health Care System LLC (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

<b>TITLE OF ACTION:</b>	Re: Shadow Glen Apartments // To: Steward Health Care System LLC
<b>DOCUMENT(S) SERVED:</b>	--
<b>COURT/AGENCY:</b>	None Specified Case # None Specified
<b>NATURE OF ACTION:</b>	Letter of Intent - Threatening Litigation
<b>ON WHOM PROCESS WAS SERVED:</b>	C T Corporation System, Baton Rouge, LA
<b>DATE AND HOUR OF SERVICE:</b>	By Courier on 01/18/2022
<b>JURISDICTION SERVED :</b>	Louisiana
<b>APPEARANCE OR ANSWER DUE:</b>	None Specified
<b>ATTORNEY(S) / SENDER(S):</b>	None Specified
<b>ACTION ITEMS:</b>	CT has retained the current log, Retain Date: 01/18/2022, Expected Purge Date: 01/23/2022  Image SOP  Email Notification, Lillie Bernard lillie.bernard@steward.org  Email Notification, Wanda Spears wanda.spears@steward.org  Email Notification, TAMELA KELLEY Tamela.Kelley@steward.org
<b>REGISTERED AGENT ADDRESS:</b>	C T Corporation System 3867 Plaza Tower Dr. Baton Rouge, LA 70816 866-665-5799 SouthTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



---

**GLANKLER  
BROWN**  
ATTORNEYS

6000 Poplar Avenue, Suite 400  
Memphis, Tennessee 38119

Via Federal Express Overnight Delivery  
Steward Health Care System, LLC  
Agent for Service of Process  
CT Corporation System  
3867 Plaza Tower Drive  
Baron Rouge, LA 708165

**GLANKLER  
BROWN.**  
ATTORNEYS

6000 Poplar Avenue, Suite 400  
Memphis, Tennessee 38119  
P 901.525.1322 F 901.525.2389  
www.glankler.com

S. Joshua Kahane  
Direct 901.576.1701  
jkahane@glankler.com

Licensed In:  
Tennessee  
Mississippi  
Arkansas  
New York  
New Jersey  
Texas  
District of Columbia

January 17, 2022

**Via Federal Express Overnight Delivery**

Jeremy M. Tinnerello, President  
Glenwood Regional Medical Center, A Steward Family Hospital  
503 McMillan Rd.  
West Monroe, LA 71291

**Via Federal Express Overnight Delivery**

John DeSantis, CFO  
Glenwood Regional Medical Center, A Steward Family Hospital  
503 McMillan Rd.  
West Monroe, LA 71291

**Via Federal Express Overnight Delivery**

Steward Health Care System, LLC  
Agent for Service of Process  
CT Corporation System  
3867 Plaza Tower Drive  
Baron Rouge, LA 708165

**Re: *Pre-Litigation Confidential Settlement Communication*  
*Shadow Glen Apartments vs. Glenwood Regional Medical Center***

Dear Messrs. Tinnerello and DeSantis:

By way of introduction, this law firm and I represent the new owners of the Shadow Glen multifamily apartment complex located at 1001 Glenwood Drive in West Monroe, Louisiana (hereinafter referred to as "Shadow Glen"). As you may be aware, Shadow Glen abuts the Glenwood Regional Medical Center (hereinafter referred to as the "Hospital") on the Hospital's southern property line. Along that property line, the Hospital has constructed a stone retention wall which- due to water discharge from the Hospital - is now in significant disrepair. The retention wall has already failed in a number of places, leaking both dirt and other debris onto the Shadow Glen property and into tenant HVAC systems. The retention wall failures are likewise damaging the Shadow Glen property and its drainage systems. I have attached hereto several photographs of the retention wall for your reference.

While Shadow Glen is already realizing damage from the retention wall disrepair, a wholesale failure of the retention wall will cause even greater damage to my client's property. **As such, something must be done and done now.**

Page 2

Shadow Glen has hired Severn Group who has inspected the area and provided the attached Report. First and foremost, the Hospital must **immediately** take whatever action may be necessary to stop the water drainage/leakage which is emanating from the Hospital and being directed onto Shadow Glen's property. Once that has been completed, Severn Group will hire a licensed engineer to prepare plans for the disassemble and rebuild of the retention wall. Shadow Glen expects that the Hospital will pay all the costs and expenses associated with this work. In that light, if there is a General Contractor with whom the Hospital would prefer to work or, with whom the Hospital would like Severn Group to confer, please certainly provide that contact information to me so that I may facilitate the introductions.

My client would far prefer to resolve this amicably, with the Hospital undertaking remedial efforts to promptly and effectively stop the drainage/leakage and with an agreement to pay the costs and expenses associated with rectifying the retention wall failures; however, in the event the Hospital is unwilling to do this, my client will be left with no alternative but to direct this office to commence litigation, including but not limited to injunctive and declaratory relief, aimed at protecting the real property and my client's other interests. I sincerely hope this will not be necessary.

After you have had a chance to review the attached, I would welcome the opportunity to speak with you or your designated agent about how we can work cooperatively to effectuate an immediate and meaningful resolution to this existing threat. I would ask that you please contact me within ten (10) days of your receipt of this letter after which we will proceed forward to protect our client's interests.

I thank you in advance for your prompt attention and anticipated cooperation.

I remain

Very Truly Yours,

GLANKLER BROWN, PLLC



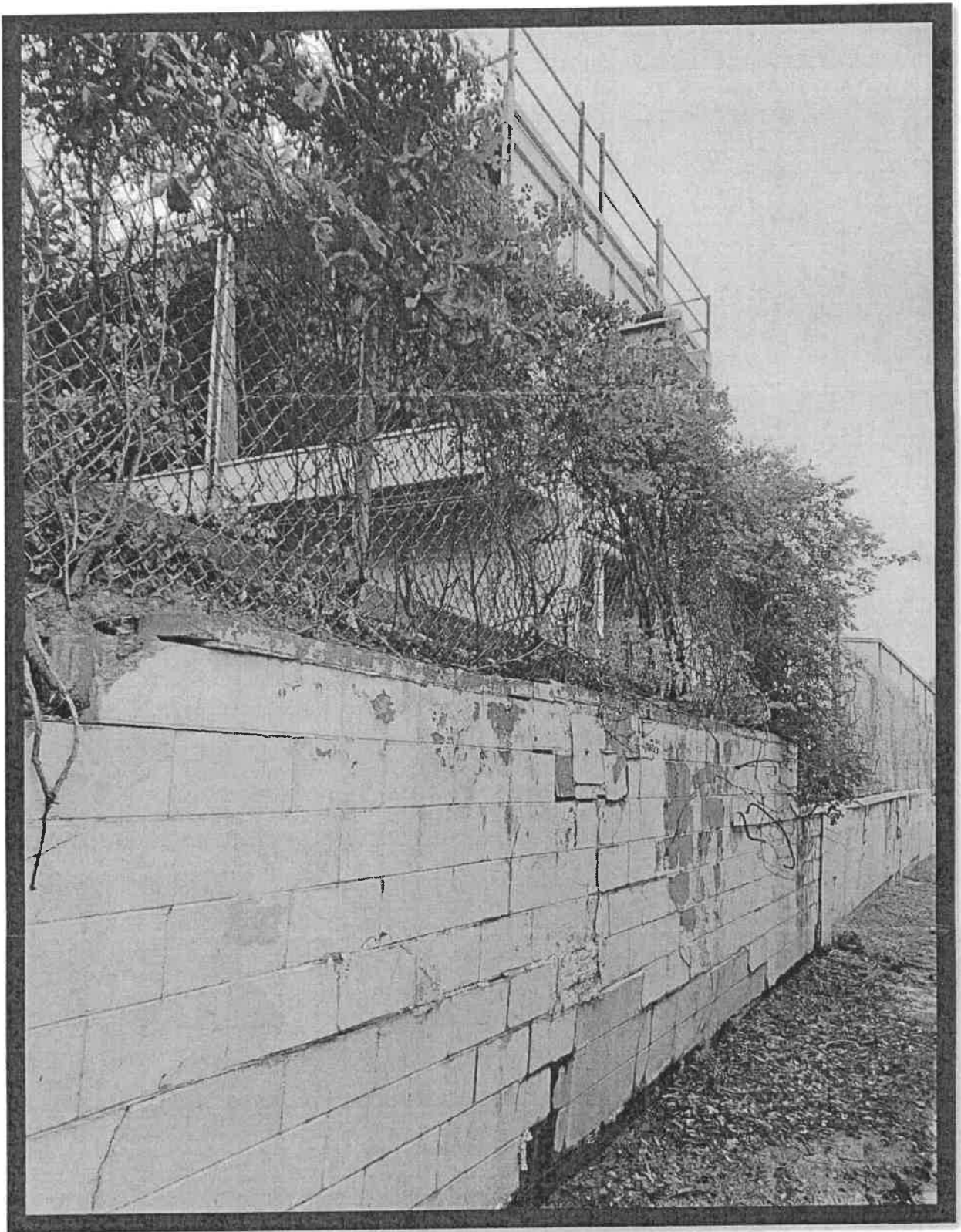
S. Joshua Mahant

cc: Client

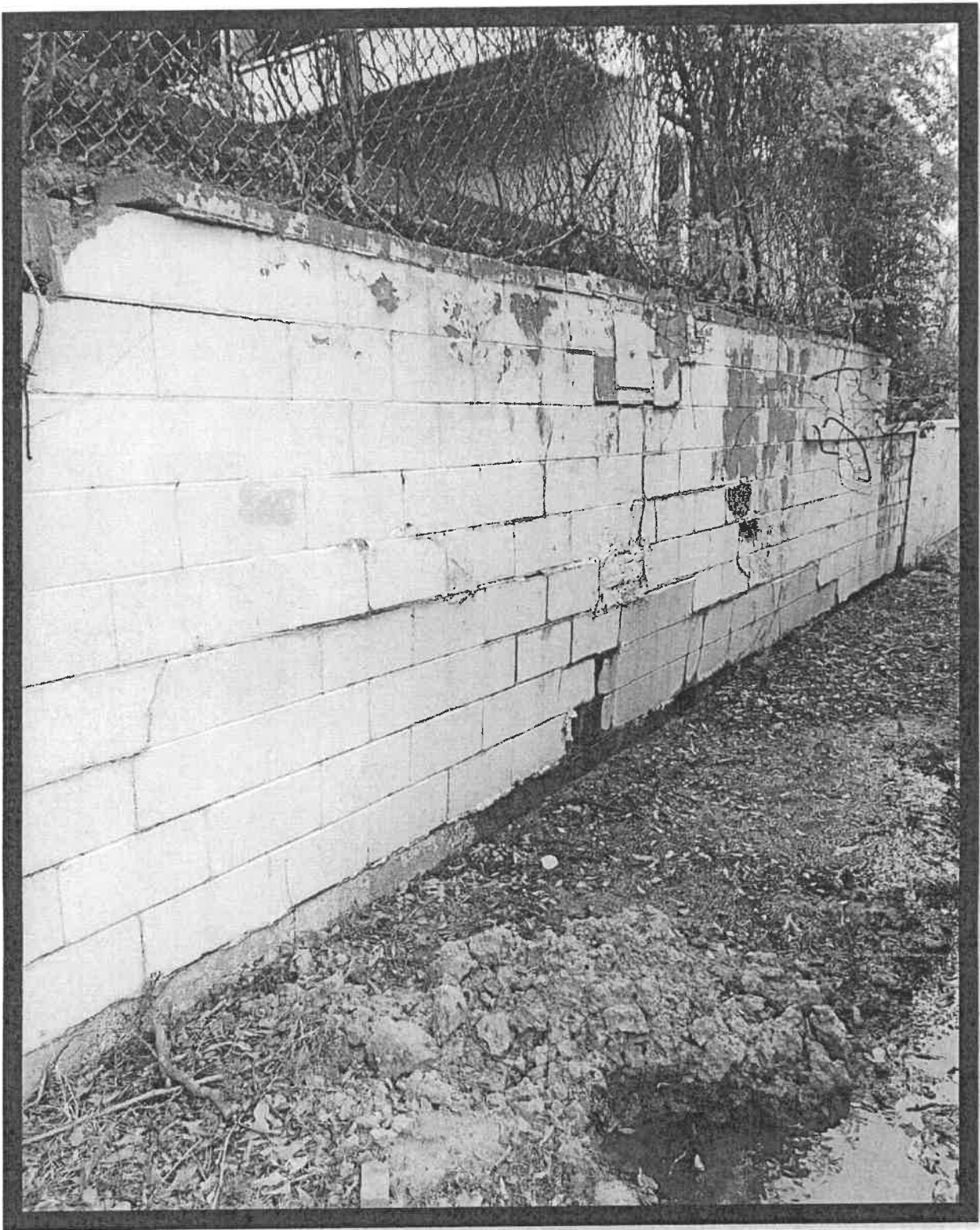
Steward Health Care Network, Inc.  
Agent for Service of Process  
CT Corporation System  
3867 Plaza Tower Drive  
Baron Rouge, LA 708165

Steward Health Care Network, Inc.  
Board of Directors  
1900 N. Pearl Street, Suite 2400  
Dallas, TX 75201

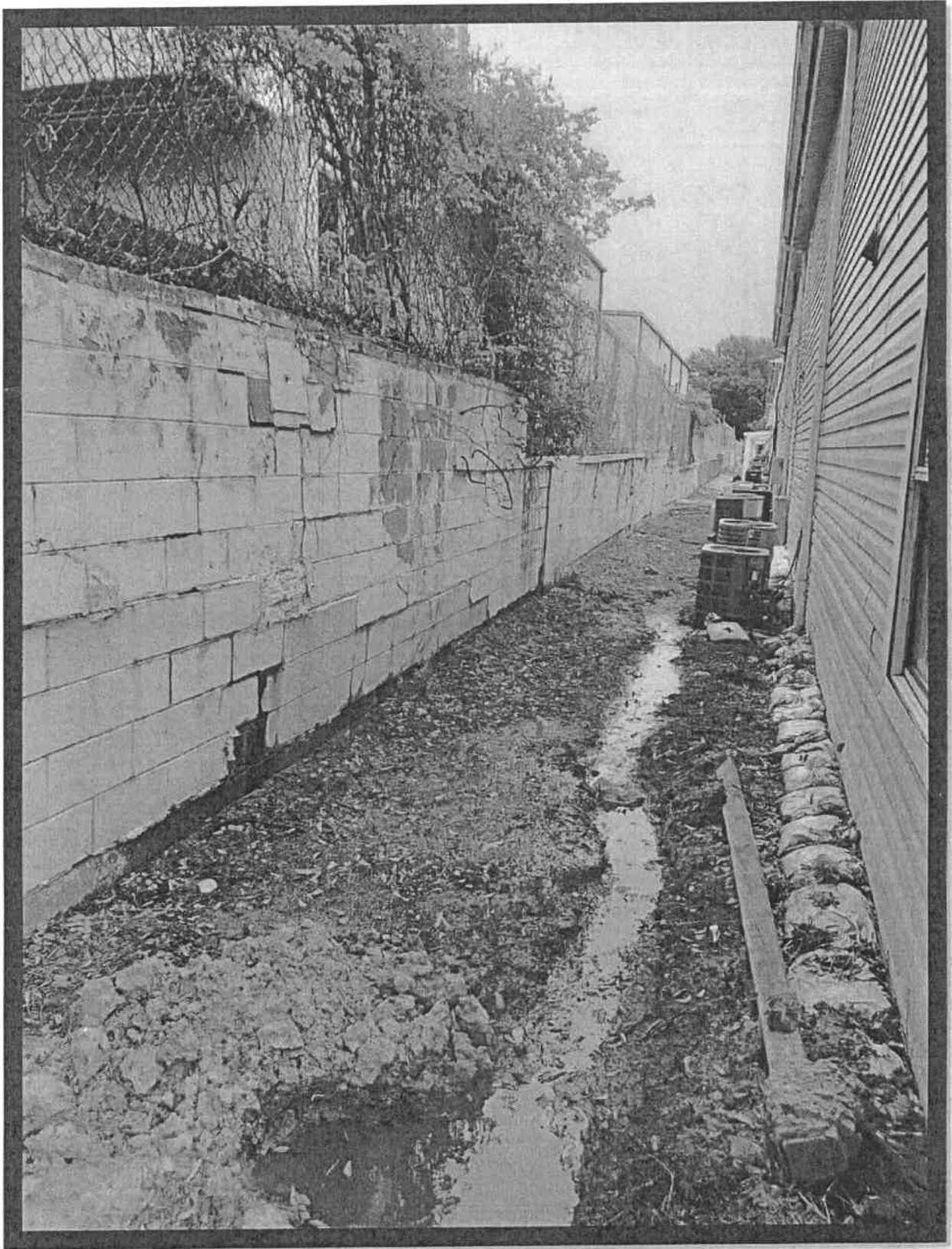


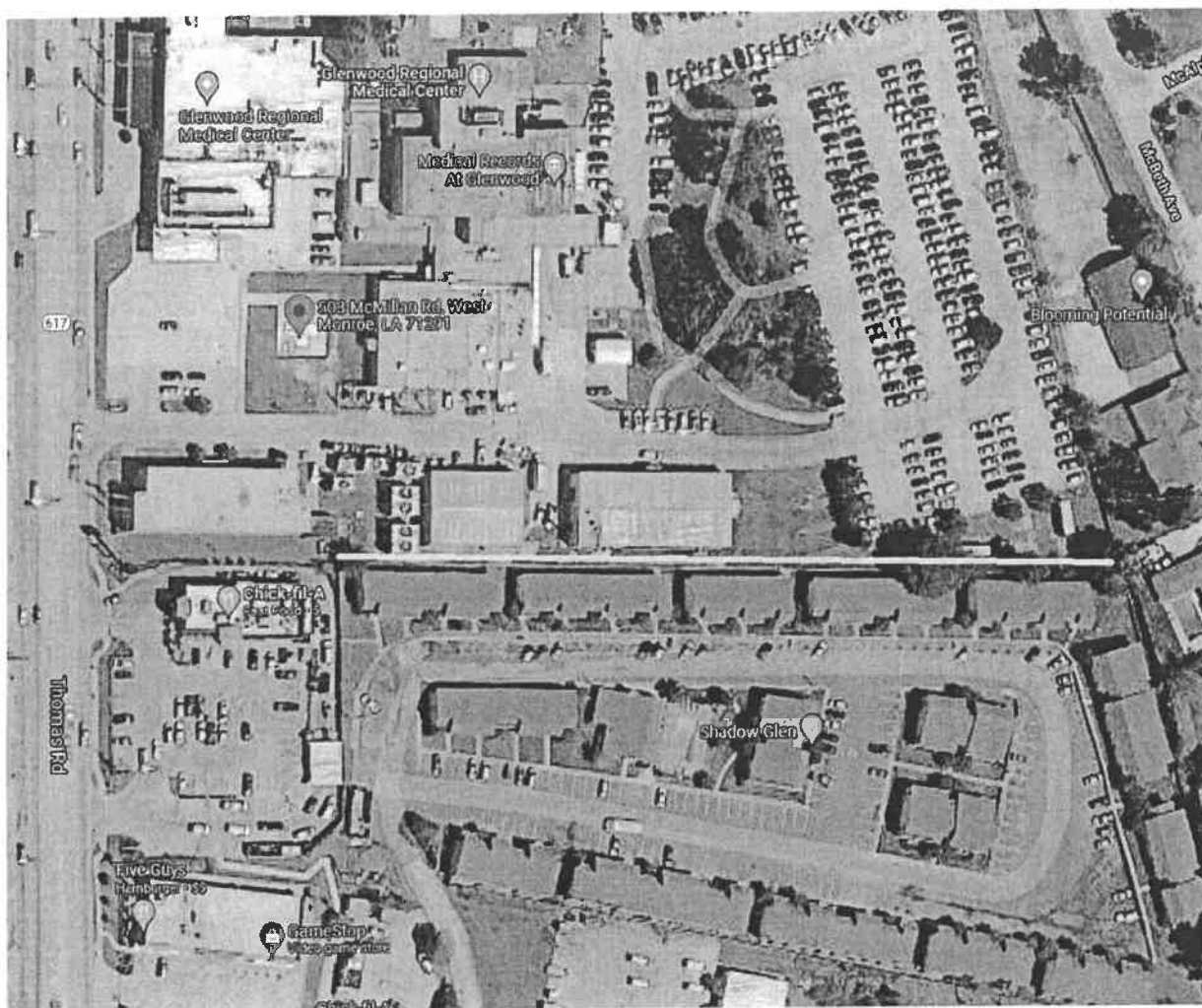
















Shadow Glenn Apartments  
1001 Glenwood Dr.  
West Monroe, LA 71291  
Attn: Mr. Shimi Kohn

Re: Retention wall

Dear Mr. Kohn,

I would like to thank you for the opportunity to procure a bid to rectify the condition of your retention wall at the above referenced address. We went out to the property on or about 12/22/21. Based on your request, we were to ascertain the cause of the breached wall and submit a proposal to fix the problem. As you know, we are always happy to serve our clients and provide a remedy to any issue they bring to us.

Unfortunately, this is quite a unique situation.

It appears that the retention wall is completely ineffective as it has been pushed past its limits by the moving earth from the property adjacent to Shadow Glenn. The rainwaters have nowhere to go other than to the retention wall and this water intrusion has caused the earth behind the wall to move and push the [wall] cinder blocks out. The adjacent property is owned by the Glenwood Regional Medical Center.

The condition of the wall has deteriorated past the point of repair. The entire wall must be disassembled and rebuilt – after the hospital fixes the drainage and erosion issues which has directly caused this issue.

For us to proceed, we will need to retain the services of a state licensed engineer to draw up plans and direct us on how to properly disassemble and rebuild this retention wall. This alone will cost between 12-15 thousand dollars.

Based on the linear footage and severity of this problem, we would estimate this project will cost a minimum of \$250,000.00.

Please let us know if you would like any further information regarding this property.

Sincerely,

Marty Rennert  
Field operations

Severn Group, Phone: (216) 282-9988  
1481 Warrensville Center Road, South Euclid, Ohio 44121